

March 5, 2024

**VIA ECF**

Honorable J. Brendan Day  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *MacLean, et al. v. Wipro Limited*, No. 3:20-3414-GC-JBD  
Joint Request for Extension to Case Schedule**

Dear Judge Day:

Pursuant to Paragraph 2 of Your Honor's Civil Case Management Order and the Pretrial Scheduling Order (Dkt. 41), the parties write to jointly request an approximately six-month extension to all case deadlines.

Good cause exists to grant the parties' request. After meeting and conferring over a number of months, the parties submitted a Joint Letter on March 1, 2024 (via email as the letter contained information subject to a discovery confidentiality order) outlining the parties' positions with respect to seven outstanding discovery issues. Issues raised in the parties' Joint Letter are foundational in nature and need to be resolved before discovery can advance. As such, the parties respectfully request that the case deadlines be extended so that the parties will have sufficient time to complete discovery (including custodial ESI discovery, depositions, and any necessary follow-up discovery) following the Court's ruling on the parties' joint letter.

The parties respectfully request that the first preexisting deadline—the deadline to raise a dispute regarding written discovery—be set six months after the Court issues a ruling on the parties' discovery disputes, as indicated in the chart below.

Joint Letter to Judge Day  
March 5, 2024

| Event  | Current Deadline (Dkt. 41) | Requested Extension   |
|--|----------------------------|---|
| Application Regarding a Dispute Regarding Written Discovery (else that application shall be deemed waived) | March 6, 2024              | 6 months following the Court's ruling on the parties' March 1, 2024 Joint Letter (submitted via email)  |
| Close of Fact Discovery  | May 23, 2024               | 11 weeks following the deadline to raise discovery disputes   |
| Any Motion for Class Certification and Any Initial Expert Disclosure and Report                            | July 25, 2024              | 9 weeks following the close of fact discovery   |
| Any Opposition to the Motion for Class Certification and Any Rebuttal Expert Disclosure and Report         | August 22, 2024            | 4 weeks following the motion for class certification and initial expert disclosure and report deadline  |
| Any Reply in Support of the Motion for Class Certification   | September 12, 2024         | 3 weeks following the class certification opposition and rebuttal expert disclosure and report deadline |
| Dispositive Motions  | December 19, 2024          | 14 weeks following the class certification reply deadline   |
| Opposition(s) to Dispositive Motions   | January 23, 2025           | 5 weeks following the dispositive motion deadline   |
| Reply(ies) to Dispositive Motions  | February 13, 2025          | 3 weeks following the dispositive motion opposition deadline  |
| Completion of Expert Discovery   | March 6, 2025              | 3 weeks following the dispositive motion reply deadline   |
| Completion of a Class-Wide Settlement Conference   | April 3, 2025              | 4 weeks following the close of expert discovery   |

If the requested extension is acceptable to Your Honor, we ask that this correspondence be "So Ordered" and entered on the docket.

Sincerely,

/s/ Jonathan Rudnick  
Jonathan Rudnick  
Daniel Kotchen (*pro hac vice*)  
Lindsey Grunert (*pro hac vice*)

Joint Letter to Judge Day  
March 5, 2024

*Attorneys for Plaintiffs and Putative Class*

/s/ Stephanie Silvano

Stephanie Silvano

Grace E. Heart (*pro hac vice*)

Greta Williams (*pro hac vice*)

Heather Richardson (*pro hac vice*)

*Attorneys for Defendant Wipro Limited*

**SO ORDERED this \_\_\_\_ day of March,  
2024**

---

**Hon. J. Brendan Day**  
**United States Magistrate Judge**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by electronic service through the Court's CM/ECF system.

By: /s/ Jonathan Rudnick